

To: Hylton Jackson (Hylton.Jackson@dnr.iowa.gov)[Hylton.Jackson@dnr.iowa.gov]
From: McCoy, Erin
Sent: Thur 4/21/2016 8:01:40 PM
Subject: FW: Test Results Drums observed during 3/31/16 site visit
DICO Sand Drum Total Metals Test.pdf
RE: Drums observed during 3/31/16 site visit

Hylton, I left you a phone message about this because it needs a fast response . While on site several weeks ago, we found some drums at the Des Moines TCE site. Dico's consultant said they would test them material and properly dispose of them once they had the results. Most were empty, but at least one of the 55 gallon drums had some sand in it.

I noticed that he only sampled for metals. Does this meet IDNR standards? Please let me know ASAP so that I can let him know. He is planning on getting a roll off on site Monday to dispose of it.

I've also attached the initial e-mail he sent me so that you can see the correspondence. Thanks!



Erin McCoy, P.G. | Remedial Project Manager

EPA Region 7 | Superfund Division | Iowa Nebraska Branch

11201 Renner Blvd | Lenexa, KS 66219

Phone: 913.551.7977

mccoy.erin@epa.gov | www.epa.gov

From: George, Gazi (Environmental) [mailto:gazi.george@titan-intl.com]
Sent: Thursday, April 21, 2016 2:41 PM
To: McCoy, Erin <McCoy.Erin@epa.gov>; Peterson, Mary <Peterson.Mary@epa.gov>
Cc: Troyanovich, Mike (Legal) <mike.troyanovich@titan-intl.com>; Mills, Brian (Safety) <brian.mills@titan-intl.com>; Albert, Eric (ENRD) <Eric.Albert@usdoj.gov>; Cozad, David <Cozad.David@epa.gov>; Pemberton, Scott <Pemberton.Scott@epa.gov>

Subject: Test Results Drums observed during 3/31/16 site visit

Erin

Attached are the testing results for the “sand drum” found at Dico and addressed in your letter during the 3/31/2016 visit with Mary

Brian Mills sampled the drum under chain of custody (attached).

I requested total metals (specifically Lead) because at one time **there was a foundry on the Dico site.**

The total metals results (under the 20 divider approach) show that the sand is **not a RCRA hazardous waste** for any of the 8 RCRA metals.

If you have any comments please respond ASAP since I am authorizing Brian Mills to get a roll off container on Monday to ship all the empty drums plus the Non-Hazardous sand addressed above to a subtitle D Landfill.

Brian: Please notify Erin of the Roll off arrival and send a copy of the shipper (bill of lading) to her attention

Thank you

From: Peterson, Mary [<mailto:Peterson.Mary@epa.gov>]

Sent: Saturday, April 02, 2016 9:26 AM

To: George, Gazi (Environmental); McCoy, Erin

Cc: Troyanovich, Mike (Legal); Mills, Brian (Safety); Albert, Eric (ENRD); Cozad, David; Pemberton, Scott

Subject: RE: Drums observed during 3/31/16 site visit

Gazi,

Thanks for your prompt reply regarding the drums. I am pleased to hear that you plan to address

the drums April 12-13. I am also pleased to learn of your experience in handling dangerous chemicals and providing training to fire departments. Our main concerns are for the safety of onsite workers and the proper disposal of the drummed materials.

Again, thank you for your prompt reply on this important matter.

Mary P. Peterson, Director

Superfund Division
EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219
Office: 913-551-7882
Cell: 816-398-3945



*"To safeguard the health of our communities for all generations,
we clean up contaminated lands.
In a culture of teamwork and respect,
we are efficient, innovative, and fiscally responsible stewards of public trust."*

From: George, Gazi (Environmental) [<mailto:gazi.george@titan-intl.com>]

Sent: Friday, April 01, 2016 4:27 PM

To: McCoy, Erin <McCoy.Erin@epa.gov>

Cc: Troyanovich, Mike (Legal) <mike.troyanovich@titan-intl.com>; Mills, Brian (Safety) <brian.mills@titan-intl.com>; Albert, Eric (ENRD) <Eric.Albert@usdoj.gov>; Cozad, David <Cozad.David@epa.gov>; Peterson, Mary <Peterson.Mary@epa.gov>; Pemberton, Scott <Pemberton.Scott@epa.gov>

Subject: Re: Drums observed during 3/31/16 site visit

Erin

Just to add and for your knowledge that I have a PhD in Chemistry since 1976 and train Fire Departments, police and military on dangerous chemicals, chemical warfare and nuclear materials pro bono and has done so for many years the latest being a few weeks ago in Illinois. I appreciate your concern and thank you

But thank you. we will address these during the week of the 12th/13th

Again, thank you

Sent from my iPhone

On Apr 1, 2016, at 4:51 PM, McCoy, Erin <McCoy.Erin@epa.gov> wrote:

Mr. Troyanovich,

During the site visit on March 31, 2016, we observed several drums located inside the building known as the Production Building. Neither Brian Mills nor Gazi George could provide any information about the contents of the drums, where they came from, who put them there, or how long they have been there. Attached are photos showing some of the drums. Most of the drums were blue polyethylene (plastic) material, but one of the drums is a steel drum and is bulging which is indicative of pressure. The bulging drum is of particular concern and must be approached and managed with extreme caution.

All of the drums need to be assessed, characterized, and disposed of immediately. Since the contents of the drums are unknown, the work should be performed by trained and qualified hazardous materials professionals. We strongly suggest using remote technologies, especially for the initial assessment of the bulging drum.

Please reply by 4 pm on April 4, 2016 regarding your willingness and intent to assess, characterize, and dispose of the drums. If a response is not received on or before 4 pm on April 4, 2016, EPA plans to address the drums as an emergency response action.

<image001.gif>Erin McCoy, P.G. | Remedial Project Manager

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<Drums 2.jpg>

<Drums.jpg>

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